

Hearing Date: July 30, 2019 at 1:00 p.m. (AST)
Informative Motion Deadline: July 26, 2019 at 3:00 p.m. (AST)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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<i>In re</i>	:	
	:	PROMESA
THE FINANCIAL OVERSIGHT AND	:	Title III
MANAGEMENT BOARD FOR PUERTO RICO,	:	
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO,	:	(Jointly Administered)
<i>et al.</i> ,	:	
	:	
Debtors. ¹	:	
-----X	:	
<i>In re</i>	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	
	:	Case No. 17-BK-04780-LTS
PUERTO RICO ELECTRICAL POWER	:	
AUTHORITY (PREPA),	:	Court Filing Relates Only to PREPA
	:	
Debtor.	:	
-----X	:	

**INFORMATIVE MOTION OF CORTLAND CAPITAL
MARKET SERVICES LLC, AS ADMINISTRATIVE AGENT,
REGARDING JULY 30, 2019 HEARING AT 1:00 P.M. (AST)**

¹ The Debtors in these title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

To the Honorable United States Magistrate Judge Judith Gail Dein:

Cortland Capital Market Services LLC (“Cortland”), as administrative agent for lenders to the Puerto Rico Electric Power Authority (“PREPA”), by and through its attorneys, hereby submits this informative motion in response to this Court’s *Order Regarding Procedures for July 30, 2019 Hearing* [Dkt. No. 1454]² (the “Scheduling Order”) setting forth guidelines for parties wishing to be heard at the July 30, 2019 hearing (the “Hearing”).

1. Emil A. Kleinhaus of Wachtell, Lipton, Rosen & Katz will appear in person on behalf of Cortland at the Hearing in Courtroom 8 of the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts 02210.

2. Counsel intends to address the following discovery motion and related pleadings:³

- *Renewed Omnibus Motion of Cortland Capital Market Services LLC, as Administrative Agent, and Solus to Compel Discovery Responses in Connection with PREPA RSA Settlement Motion* [Dkt. No. 1470];
- *Joint Response of the Puerto Rico Electric Power Authority, the Financial Oversight and Management Board for Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority to the Renewed Omnibus Motion to Compel of Cortland Capital Market Services LLC, as*

² Unless otherwise noted, “Dkt. No.” refers to docket entries in Case No. 17-BK-4780-LTS.

³ The discovery motion relates to the *Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922 and 928, and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement and Tolling Certain Limitations Periods* [Dkt. No. 1235], as supplemented by the *Supplemental Memorandum of Law and Facts in Support of Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement and Tolling Certain Limitations Periods* [Dkt. No. 1425] and the *Second Supplemental Memorandum of Law and Facts in Support of Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement and Tolling Certain Limitations Periods* [Dkt. No. 1486].

Administrative Agent, and Solus in Connection with the PREPA RSA Rule 9019 Motion [Dkt. No. 1501];

- *Reply in Support of Renewed Omnibus Motion of Cortland Capital Market Services LLC, as Administrative Agent, to Compel Discovery Responses in Connection with PREPA RSA Settlement Motion* [Dkt. No. 1519].

3. Cortland reserves all rights to be heard on any matter raised by any party at the Hearing related to the Title III cases or the interests of Cortland.

Dated: July 26, 2018

Respectfully submitted,

/s/ Nayuan Zouairabani
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